

EXHIBIT A

1 HANSON BRIDGETT LLP
2 KURT A. FRANKLIN, SBN 172715
3 kfranklin@hansonbridgett.com
4 SAMANTHA WOLFF, SBN 240280
5 swolff@hansonbridgett.com
425 Market Street, 26th Floor
San Francisco, California 94105
Telephone: (415) 777-3200
Facsimile: (415) 541-9366

6 HANSON BRIDGETT LLP
7 TYSON M. SHOWER, SBN 190375
tshower@hansonbridgett.com
8 LANDON D. BAILEY, SBN 240236
lbailey@hansonbridgett.com
500 Capitol Mall, Suite 1500
9 Sacramento, California 95814
Telephone: (916) 442-3333
10 Facsimile: (916) 442-2348

11 OTTEN LAW, PC
12 VICTOR OTTEN, SBN 165800
13 vic@ottenlawpc.com
14 KAVITA TEKCHANDANI, SBN 234873
15 kavita@ottenlawpc.com
3620 Pacific Coast Highway, #100
Torrance, California 90505
Telephone: (310) 378-8533
Facsimile: (310) 347-4225

16 Attorneys for Plaintiffs
17 CORY SPENCER, DIANA MILENA REED, and COASTAL PROTECTION
RANGERS, INC.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

21 CORY SPENCER, an individual;
22 DIANA MILENA REED, an
individual; and COASTAL
23 PROTECTION RANGERS, INC., a
California non-profit public benefit
24 corporation.

Plaintiffs.

v.

28 | LUNADA BAY BOYS: THE

CASE NO. 2:16-cv-02129-SJO (RAOx)

**[PROPOSED] STIPULATION AND
ORDER REGARDING PLAINTIFFS'
MOTION TO COMPEL
PRODUCTION BY DEFENDANT
BRANT BLAKEMAN**

Hon. Rozella A. Oliver

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

1 INDIVIDUAL MEMBERS OF THE
2 LUNADA BAY BOYS, including but
3 not limited to SANG LEE, BRANT
4 BLAKEMAN, ALAN JOHNSTON
5 AKA JALIAN JOHNSTON,
6 MICHAEL RAE PAPAYANS,
7 ANGELO FERRARA, FRANK
8 FERRARA, CHARLIE FERRARA,
9 and N. F.; CITY OF PALOS
10 VERDES ESTATES; CHIEF OF
11 POLICE JEFF KEPLEY, in his
representative capacity; and DOES
1-10,

10 Defendants.

12 On January 25, 2017, in conjunction with Plaintiffs' motion to compel
13 production by Defendant Brant Blakeman, this Court ordered the parties to
14 submit a joint proposed order identifying the third-party forensic expert and
15 setting forth a review protocol pertaining to the review and production of
16 Defendant Blakeman's videos that are responsive to Document Request
17 Nos. 12, 13, 39 and 40. Accordingly, the Parties stipulate and the Court
18 orders as follows:

19 1. Defendant Blakeman has selected San Diego Digital Forensics
20 as the third-party forensic expert. Plaintiffs do not oppose Defendant's
21 selection. The parties agree that San Diego Digital Forensics shall execute
22 Exhibit A to the Court's Protective Order.

23 2. The review protocol will proceed as follows:

24 a) Defendant Blakeman or his counsel will provide all memory
25 cards that may contain responsive data to San Diego Digital Forensics
26 within three (3) business days of the date this order is signed. San Diego
27 Digital Forensics shall create at least two (2) forensically-sound copies of the
28 photographs and videos and return the original memory cards to counsel for

1 Defendant Blakeman. Defendant Blakeman and his counsel agree not to
2 access or open data on any of the memory cards until such time as San
3 Diego Digital Forensics creates forensically-sound copies of the memory
4 cards and preserves existing metadata.

5 b) Defendant Blakeman agrees to cooperate as necessary
6 with San Diego Digital Forensics to the extent reasonably necessary to
7 retrieve the relevant data.

8 c) After all videos and photographs are recovered from the
9 memory cards and two (2) forensically-sound copies are created by San
10 Diego Digital Forensics, San Diego Digital Forensics will provide all
11 extracted photographs and videos to Defendant Blakeman's counsel in a
12 reviewable format consistent with Fed. R. Civ. P. 34(a)(1)(A) and Fed. R.
13 Civ. P. 34(b)(2)(E)(ii) so that the photographs and videos are produced in a
14 "reasonably useable form."

15 d) Defendant Blakeman's counsel will have ten (10) business
16 days to review the information and designate information as responsive to
17 Request for Production Nos. 12, 13, 39 and 40 according to the date and
18 location restrictions indicated in this Court's January 25, 2017 Order.

19 e) Defendant Blakeman's counsel will then inform San Diego
20 Digital Forensics of his responsive designations and San Diego Digital
21 Forensics will have two (2) business days to return a forensically sound
22 copy of the designated information which shall only include photographs and
23 videos and no other data, to counsel for Defendant Blakeman, who will then
24 review the production and designate information "CONFIDENTIAL" pursuant
25 to the Court's Protective Order. This designation shall take place within two
26 (2) business days of receipt of the designated production. Defendant
27 Blakeman's counsel will conduct this review and designation in a forensically
28 sound manner that preserves the evidentiary integrity of the photographs

1 and videos to be produced.

2 f) Defendant Blakeman's counsel will then produce the
3 responsive photographs and videos, including metadata, to Plaintiffs'
4 counsel in reasonably useable form the following business day.

5 3. The parties agree not have ex parte communications with the
6 vendor regarding Defendant Blakeman's data at any time.

7 4. Defendant Blakeman will bear the cost of the third party vendor.

8
9 IT IS SO STIPULATED.

10 DATED: February . 2017 HANSON BRIDGETT LLP

11
12 Bv: _____
13 KURT A. FRANKLIN
14 SAMANTHA D. WOLFF
15 Attorneys for Plaintiffs
16 CORY SPENCER, DIANA MILENA
17 REED, and COASTAL PROTECTION
18 RANGERS, INC.

19 DATED: February . 2017 VEATCH CARLSON, LLP

20
21 Bv: _____
22 RICHARD P. DIEFFENBACH
23 JOHN P. WORGUL
24 Attorneys for Defendant
25 BRANT BLAKEMAN

26 DATED: February . 2017 BUCHALTER NEMER

27
28 Bv: _____
29 ROBERT S. COOPER
30 Attorneys for Defendant
31 BRANT BLAKEMAN

32 / / /

33 / / /

34 / / /

1 IT IS SO ORDERED.
2
3 DATED: _____

4 HON. ROZELLA A. OLIVER
5 United States Magistrate Judge
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28